

UNITED STATES DISTRICT COURT

for the

Central District of California

UNICOLORS, INC., a California corporation,

Plaintiff(s)

v.

BELLA LIA BOUTIQUE, a Washington business
entity of unknown form; BERTIE & OLIF LTD., a
Texas limited company; BLUE ZONE PLANET, a
Canadian business entity (con't. on pgs. 3-4)

Defendant(s)

Civil Action No. 2:24-cv-05851

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

BELLA LIA BOUTIQUE, a Washington business entity of unknown form; BERTIE & OLIF LTD., a Texas limited company; BLUE ZONE PLANET, a Canadian business entity of unknown form; SHOPSOCIAL, INC., a Delaware corporation d/b/a "Trendsi"; FILLY FLAIR BOUTIQUE LLC, a South Dakota limited liability company; FLYCLOTHING, LLC, an Arizona limited liability company; FOXY BEE LLC, a Florida limited liability company, d/b/a "Foxy Bee Boutique"; TRACEY DAIL, an individual d/b/a "Fun Essentials Boutique"; HUZGO, a Texas business entity of unknown form; LIAM'S LOFT, INC., a Utah corporation d/b/a "Liam & Company"; MODESHE LIMITED, a California business entity of unknown form d/b/a "ModeShe"; OLIVER & JADE, a California business entity of unknown form; DAWN BAKER, an individual d/b/a "Shop Sassy Boutique"; MARSHA REID, an individual d/b/a "Shop Sassy Boutique"; S.P.J BOUTIQUE, LLC, an Iowa limited liability company; SUNNY ANGELA, an Oregon business entity of unknown form; INDIGO TEE OF OKLAHOMA, LLC, an Oklahoma limited liability company d/b/a "Tee for the Soul"; NHN GLOBAL, INC., a California corporation d/b/a "FASHIONGO"; PRETTY BASH, a California corporation; and DOES 1 through 10,

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Trevor W. Barrett, Esq.
Frank R. Trechsel, Esq.
DONIGER / BURROUGHS
603 Rose Avenue
Venice, CA 90291

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. 2:24-cv-05851

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

1 Trevor W. Barrett (SBN 287174)
tbarrett@donigerlawfirm.com
2 Frank Trechsel (SBN 312199)
3 ftrechsel@donigerlawfirm.com
DONIGER/BURROUGHS
4 603 Rose Avenue
5 Venice California 90291
6 Telephone: (310) 590-1820

7 *Attorneys for Plaintiff*

8
9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**

11 UNICOLORS, INC., a California
12 corporation,

13 Plaintiff,

14 v.

15 BELLA LIA BOUTIQUE, a Washington
16 business entity of unknown form; BERTIE
& OLIF LTD., a Texas limited company;
17 BLUE ZONE PLANET, a Canadian
18 business entity of unknown form;
SHOPSOCIAL, INC., a Delaware
19 corporation d/b/a “Trendsi”; FILLY
20 FLAIR BOUTIQUE LLC, a South Dakota
limited liability company;
21 FLYCLOTHING, LLC, an Arizona
22 limited liability company; FOXY BEE
LLC, a Florida limited liability company,
23 d/b/a “Foxy Bee Boutique”; TRACEY
24 DAIL, an individual d/b/a “Fun Essentials
Boutique”; HUZGO, a Texas business
25 entity of unknown form; LIAM’S LOFT,
26 INC., a Utah corporation d/b/a “Liam &
Company”; MODESHE LIMITED, a
27 California business entity of unknown
28 form d/b/a “ModeShe”; OLIVER & JADE,

Case No.: 2:24-cv-05851

PLAINTIFF’S COMPLAINT FOR:

1. COPYRIGHT
INFRINGEMENT; and
2. VICARIOUS AND/OR
CONTRIBUTORY
COPYRIGHT INFRINGEMENT

Jury Trial Demanded

a California business entity of unknown form; DAWN BAKER, an individual d/b/a “Shop Sassy Boutique”; MARSHA REID, an individual d/b/a “Shop Sassy Boutique”; S.P.J BOUTIQUE, LLC, an Iowa limited liability company; SUNNY ANGELA, an Oregon business entity of unknown form; INDIGO TEE OF OKLAHOMA, LLC, an Oklahoma limited liability company d/b/a “Tee for the Soul”; NHN GLOBAL, INC., a California corporation d/b/a “FASHIONGO”; PRETTY BASH, a California corporation; and DOES 1 through 10,

Defendants.

Plaintiff UNICOLORS, INC. (“Unicolors” or “Plaintiff”), by and through its undersigned attorneys, complains and alleges against Defendants as follows:

NATURE OF ACTION

1. Plaintiff seeks injunctive relief and damages stemming from Defendants BELLA LIA BOUTIQUE, a Washington business entity of unknown form; BERTIE & OLIF LTD., a Texas limited company (“Bertie & Olif”); BLUE ZONE PLANET, a Canadian business entity of unknown form; SHOPSOCIAL, INC., a Delaware corporation d/b/a “Trendsi” (“Trendsi”); FILLY FLAIR BOUTIQUE LLC, a South Dakota limited liability company (“Filly Flair”); FLYCLOTHING, LLC, an Arizona limited liability company (“FlyClothing”); FOXY BEE LLC, a Florida limited liability company (“Foxy Bee”); TRACEY DAIL, an individual d/b/a “Fun Essentials Boutique” (“Fun Essentials Boutique”); HUZGO, a Texas business entity of unknown form (“Huzgo”); LIAM’S LOFT, INC., a Utah corporation d/b/a “Liam & Company” (“Liam & Company”); MODESHE LIMITED, a California business entity of unknown form d/b/a “ModeShe” (“ModeShe”); OLIVER & JADE, a California business entity of unknown form (“Oliver & Jade”); DAWN BAKER, an individual